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8 *Pictures Corporation*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHOSH YONAY and YUVAL YONAY.

14 || Plaintiffs,

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16 PARAMOUNT PICTURES
17 CORPORATION, a Delaware
corporation, and DOES 1-10.

18 Defendants

Case No. 2:22-CV-3846-PA-GJS

**JOINT STIPULATION RE:
DEFENDANTS' REQUEST FOR
PRODUCTION NOS. 38-40**

Case No. 2:22-CV-3846-PA-GJS

District Judge: Hon. Percy Anderson
Magistrate Judge: Hon. Gail J. Standish
Liability Disc. Cutoff: Oct. 6, 2023
Damages Disc. Cutoff: Feb. 23, 2024

JOINT STIPULATION

Plaintiffs Shosh Yonay and Yuval Yonay (“Plaintiffs”) and Defendant Paramount Pictures Corporation (“PPC” and, together with Plaintiffs, the “Parties”) stipulate as follows:

WHEREAS, on July 24, 2023, PPC filed a Motion to Compel (“Motion”) seeking an order requiring Plaintiffs to produce documents responsive to PPC’s First Set of Requests for Production (“RFPs”) and to serve amended responses to PPC’s First Set of Interrogatories (“ROGs”) and First Set of Requests for Admission (“RFAs”), ECF No. 40;

WHEREAS, the Parties met and conferred on August 1, 2023, and as a result of this meet-and-confer, the Parties were able to reach a compromise agreement and agreed to and did file a Joint Stipulation and [Proposed] Order reflecting their agreement, ECF No. 43;

WHEREAS, the Court so-ordered the Parties' [Proposed] Order on August 7, 2023, with certain modifications, ECF No. 44;

WHEREAS, with regard to PPC's Requests for Production Nos. 38-40, the Court's August 7, 2023 Order provides that the Parties shall continue to meet and confer and, if unable to reach agreement on such requests, shall file a joint status report with the Court on or before August 11, 2023 that summarizes the Parties' respective positions in no more than one page per party, ECF No. 44;

WHEREAS, the parties continued to meet and confer regarding Request for Production Nos. 38-40 on August 8 and 9, 2023, and were able to reach a compromise agreement and agreed to jointly request that the concurrently filed [Proposed] Order be so-ordered by the Court.

Based on the foregoing, **IT IS HEREBY STIPULATED** by and between the Parties, through their respective counsel of record, subject to the Court's approval, that:

- 1 1. In response to PPC's Request for Production No. 38, following a
2 reasonably diligent search, Plaintiffs located no prior drafts of Ehud
3 Yonay's book *No Margin for Error*, and notwithstanding their
4 objections to this request, Plaintiffs respond that they have no
5 documents responsive to this request in their possession, custody, or
6 control.
- 7 2. In response to PPC's Request for Production No. 39, following a
8 reasonably diligent search, Plaintiffs located certain handwritten notes
9 by Ehud Yonay regarding *No Margin for Error* and, notwithstanding
10 their objections to this request, Plaintiffs shall produce such notes.
- 11 3. In response to PPC's Request for Production No. 40, following a
12 reasonably diligent search, Plaintiffs located agreements for the
13 publication of *No Margin for Error* in Hebrew and in English, as well
14 as an agreement for the publication of "Top Guns" with a magazine
15 other than California Magazine and, notwithstanding their objections
16 to this request, Plaintiffs shall produce these documents.
- 17 4. Plaintiffs shall complete their production of the above mentioned
18 documents on or before August 21, 2023.
- 19 5. The Parties jointly request that the Court so-order the concurrently-
20 filed [Proposed] Order.

1 Dated: August 11, 2023

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By: /s/ Molly M. Lens
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Dated: August 11, 2023

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1 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other
2 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
3 content and have authorized the filing.

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6 Dated: August 11, 2023

O'MELVENY & MYERS LLP

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8 By: /s/ Molly M. Lens
9 Molly M. Lens

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